

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM: 2.23**  
**(ID # 27621)**

**MEETING DATE:**  
Tuesday, May 20, 2025

**FROM :** COUNTY COUNSEL

**SUBJECT:** COUNTY COUNSEL: Approve a Conflict of Interest Code for Visit Greater Palm Springs; District: 4; [\$0]

**RECOMMENDED MOTION:** That the Board of Supervisors:

1. Approve the Conflict of Interest Code of Visit Greater Palm Springs; and
2. Direct the Clerk of the Board to notify Visit Greater Palm Springs of the action taken.

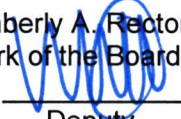
**ACTION:**Consent

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**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Gutierrez, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Medina, Spiegel, Washington, Perez and Gutierrez  
Nays: None  
Absent: None  
Date: May 20, 2025  
xc: Co.Co., COB/AB

Kimberly A. Rector  
Clerk of the Board  
By:   
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	N/A	N/A	N/A	N/A
<b>NET COUNTY COST</b>	N/A	N/A	N/A	N/A
<b>SOURCE OF FUNDS: N/A</b>			<b>Budget Adjustment:</b>	<b>N/A</b>
			<b>For Fiscal Year:</b>	<b>N/A</b>

**C.E.O. RECOMMENDATION:** [CEO use]

**BACKGROUND:**

**Summary**

The Political Reform Act prohibits a public official from using his or her position to influence a government decision in which he or she has a financial interest. Government Code section 87300 requires local government agencies to adopt and promulgate a Conflict of Interest Code identifying officials and employees required to file statements of economic interest based on the positions they hold. A local government agency, as defined by Government Code section 82041, includes Visit Greater Palm Springs.

Each even-numbered year, Government Code section 87306.5 requires local government agencies to review their Conflict of Interest Code, make appropriate revisions, if necessary, and submit an amended Conflict of Interest Code to the code reviewing body. Government Code section 82011(b) identifies the Board of Supervisors for the County of Riverside as the code reviewing body for a local government agency within its county.

Visit Greater Palm Springs amended its Conflict of Interest Code on June 26, 2024, to add new positions, delete positions and revise titles of existing positions that participate in making governmental decisions. The JPA Executive Committee for Visit Greater Palm Springs has adopted Resolution No. JPA 2024-009, amending its Conflict of Interest Code. Visit Greater Palm Springs has submitted its amended Conflict of Interest Code for approval by the Board of Supervisors as the code reviewing body.

This office has reviewed the Conflict of Interest Code of Visit Greater Palm Springs and has found that it complies with statutory requirements. A complete copy of the Conflict of Interest Code of Visit Greater Palm Springs is attached.

It is recommended that the Board of Supervisors approve the Conflict of Interest Code of Visit Greater Palm Springs and direct the Clerk of the Board to notify Visit Greater Palm Springs of the action taken.

**Impact on Residents and Businesses**

N/A

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA

**Additional Fiscal Information**

N/A

**Contract History and Price Reasonableness**

N/A

**ATTACHMENTS:**

**Attachment A:** Resolution JPA 2024-009

**Attachment B:** Conflict of Interest Code Visit Greater Palm Springs



# JOINT POWERS AUTHORITY EXECUTIVE COMMITTEE

## RESOLUTION NO. JPA 2024-009

**Gary Gardner, Chair**  
City of Desert Hot Springs

**Waymond Fermon, Vice Chair**  
City of Indio

**Mark Carnevale**  
City of Cathedral City

**Dr. Frank Figueroa**  
City of Coachella

**Greg Sanders**  
City of Indian Wells

**Linda Evans**  
City of La Quinta

**Jan Harnik**  
City of Palm Desert

**Jeffrey Bernstein**  
City of Palm Springs

**Steve Downs**  
City of Rancho Mirage

**V. Manuel Perez**  
County of Riverside

### **A RESOLUTION OF THE JOINT POWERS AUTHORITY ("JPA") EXECUTIVE COMMITTEE OF VISIT GREATER PALM SPRINGS AMENDING THE CONFLICT OF INTEREST CODE OF VISIT GREATER PALM SPRINGS**

**WHEREAS**, Visit Greater Palm Springs ("VGPS") is a joint powers authority ("JPA") operating under the Joint Exercise of Powers Act (California Government Code Section 6500 et seq.), located in the County of Riverside, State of California; and

**WHEREAS**, Visit Greater Palm Springs members ("VGPS Members") include the cities of Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs and Rancho Mirage and the County of Riverside; and

**WHEREAS**, the Political Reform Act, Government Code Sections 8100, et. seq., requires state and local government agencies to adopt and promulgate conflict-of-interest codes.; and

**WHEREAS**, the JPA Executive Committee has adopted a Conflict of Interest Code that governs VGPS officials and employees; and

**WHEREAS**, notice of the time and place of a public meeting on, and of consideration by the JPA Executive Committee of, the proposed amended Conflict of Interest Code was provided each affected designated employee and publicly posted for review at the offices of VGPS; and

**WHEREAS**, a public meeting was held upon the proposed amended Conflict of Interest Code at a regular meeting of the JPA Executive Committee on September 27, 2024, at which all present were given an opportunity to be heard on the proposed amended Conflict of Interest Code; and

**WHEREAS**, the JPA Executive Committee finds that it is appropriate to amend the Conflict of Interest Code to add and delete designated positions subject to the Conflict of Interest Code's requirements and make minor clarifications to the Conflict of Interest Code as set forth in Exhibit 1 hereto and incorporated herein by this reference.

**NOW, THEREFORE, BE IT RESOLVED** by the JPA Executive Committee of Visit Greater Palm Springs that the members of the JPA Executive Committee do hereby adopt the proposed amended Conflict of Interest Code, a copy of which is attached hereto and shall be on file with the Clerk of Visit Greater Palm Spring and available to the public for inspection and copying;

**BE IT FURTHER RESOLVED** that the said amended Conflict of Interest Code shall be submitted to the Board of Supervisors of the County of Riverside for approval and said Conflict of Interest Code shall become effective 30 days after the Board of Supervisors approves the proposed amended Conflict of Interest Code as submitted.

**ATTACHMENT "1" TO  
A RESOLUTION OF THE JOINT POWERS AUTHORITY ("JPA") EXECUTIVE  
COMMITTEE OF VISIT GREATER PALM SPRINGS AMENDING THE  
CONFLICT OF INTEREST CODE OF VISIT GREATER PALM SPRINGS**

AMENDED CONFLICT OF INTEREST CODE OF GREATER PALM SPRINGS

## APPENDIX A

### VISIT GREATER PALM SPRINGS

#### CONFLICT OF INTEREST CODE DESIGNATED EMPLOYEES/POSITIONS

TITLE	DISCLOSURE CATEGORY
Members or Chairman of (Member and Alternate) JPA EXECUTIVE COMMITTEE	1, 3
Members or Chairman of BOARD OF DIRECTORS	1, 3
President & CEO	1, 3

*(List each position in which the incumbent has or would have the authority to make or influence the making of decisions which could have economic effect on that person's financial interest, to lowest level, such as the person making decisions concerning purchase or selection of office supplies. Assign the appropriate disclosure category.)*

Chief Sales & Marketing Officer	1, 3
Director of Brand Communications	1, 3
Director of Communications	1, 3
Director of Economic Development	1, 3
Director of Group Sales	1, 3
Director of Human Resources	1, 3
Director of Indian Wells Tourism	1, 3
Director of Marketing	1, 3
Director of Operations	1, 3
Director of Palm Springs Tourism	1, 3
Director of Sales	1, 3
Director of Sales Operations	1, 3
Director of Sales & Business Development	1, 3
Director of Sustainability & Community Engagement	1, 3
Director of Tourism Development	1, 3
National Sales Manager	1, 3
National Accounts Director	1, 3
Small Meetings Manager	1, 3
Vice President of Communications	1, 3
Vice President Finance & Administration	1, 3
Vice President of Government & Industry Relations	1, 3
Vice President of Sales	1, 3

Revised June 3, 2024

## APPENDIX B

### VISIT GREATER PALM SPRINGS

#### CONFLICT OF INTEREST CODE DISCLOSURE CATEGORIES

##### CATEGORY 1.

Filers in this category shall disclose the following:

- a) Any business entity located in or doing business within the jurisdiction, in which the filer has a direct or indirect interest worth one thousand dollars (\$1,000) or more.
- b) Any business entity, wherever located, engaged in, involved in or in any way related to the hospitality, hotel, restaurant, transportation, tourism, convention or visitor-related industries, in which the filer has a direct or indirect interest worth one thousand dollars (\$1,000) or more.
- c) Any investment of one thousand dollars (\$1,000) or more in real property located within the jurisdiction, zoned, used, intended or usable for hospitality, hotel, restaurant, transportation, tourism, convention or visitor-related uses.
- d) Any business entity located in or doing business within the jurisdiction, in which the filer is a director, officer, partner, trustee, employee, or holds any position of management.
- e) Any business entity, wherever located, engaged in, involved in or in any way related to the hospitality, hotel, restaurant, transportation, tourism, convention or visitor-related industries, in which the filer is a director, officer, partner, trustee, employee, or holds any position of management.
- f) Any source of income, other than gifts or loans, by a commercial lending institution in the regular course of business on terms available to the public without regard to official status, aggregating two hundred fifty dollars (\$250) or more in value provided to, received by or promised to the filer within the 12 months preceding the filing.
- g) Any donor of, or any intermediary or agent for a donor of, a gift or gifts aggregating two hundred fifty dollars (\$250) or more in value provided to, received by or promised to the filer within the 12 months preceding the filing.

## CATEGORY 2.

Filers in this category shall disclose the following:

- a) Any business entity located in or doing business within the jurisdiction, in which the filer has a direct or indirect interest worth one thousand dollars (\$1,000) or more.
- b) Any business entity located in or doing business within the jurisdiction, in which the filer is a director, officer, partner, trustee, employee, or holds any position of management.
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## CATEGORY 3.

Filers in this category shall disclose the following:

- a) Any business entity engaged in the advertising, promotion, public relations, publicity, office equipment sales or leasing, or office supplies sales business, located in or doing business within the jurisdiction, in which the filer has a direct or indirect interest worth one thousand dollars (\$1,000) or more.
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CONFLICT OF INTEREST CODE FOR VISIT  
GREATER PALM SPRINGS

(A Joint Powers Authority created pursuant to Government Code Section 6501 et seq.)

In conformance with Government Code Sections 87300 et seq., Visit Greater Palm Springs hereby adopts and promulgates this conflict of interest code.

Reference is hereby made to 2 California Administrative Code Section 18730, and by this reference said section, as it now reads and as it may hereafter be duly amended by the Fair Political Practices Commission, is incorporated herein as if set forth in full.

Designated employees shall file their statements with Visit Greater Palm Springs, which will make the statements available for public inspection and reproduction. Statements of Economic Interests are public records open for public inspection and reproduction pursuant to Government Code section 81008. If a statement is received in signed paper format, Visit Greater Palm Springs's filing official shall make and retain a copy and forward the original of this statement to the filing officer, the County of Riverside Clerk of the Board of Supervisors. If a statement is electronically filed using the County of Riverside's Form 700 e-filing system, both Visit Greater Palm Springs's filing official and the County of Riverside Clerk of the Board of Supervisors will receive access to the filed statement simultaneously.

A newly created position that makes or participates in the making of decisions that may foreseeably have a material effect on any financial interest of the position-holder, and which specific position title is not yet listed in Visit Greater Palm Springs's conflict of interest code is included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation: The President & CEO of Visit Greater Palm Springs may determine in writing that a particular newly created position, although a "designated position," is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the broadest disclosure requirements, but instead must comply with more tailored disclosure requirements specific to that newly created position. Such written determination shall include a description of the newly created position's duties and based upon that description, a statement of the extent of disclosure requirements. The President & CEO's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Gov. Code Sec. 81008.)

Attached hereto as Appendix A is a list of designated officers and employees, together with disclosure categories assigned to each such designated officer or employee.

Attached hereto as Appendix B is a schedule of disclosure categories identifying the economic interests which must be disclosed by designated officers or employees within each such category. Each designated officer or employee shall file statements of economic interests at the times and in the manner prescribed by law.

The Secretary or other official charged with the duty of maintaining the official records of Visit Greater Palm Springs shall be the filing officer for such statements.

The Board of Supervisors of the County of Riverside shall be the Code Reviewing Body for this agency.

CERTIFICATE OF AGENCY APPROVAL

I, SCOTT L. WHITE, hereby certify that the foregoing Conflict of Interest Code, together with attached appendices, was adopted by the Visit Greater Palm Springs on June \_\_, 2024, and is submitted to the Code Reviewing Body for approval. I further certify that said code has been prepared, promulgated and adopted in conformity with the provisions of Government Code Sections 87301, 87309 and 87311.

Date: 6/24/24

  
\_\_\_\_\_  
Scott White, President & CEO  
Visit Greater Palm Springs

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Revised June 3, 2024

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